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January 18, 2024

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Drew Dixon v. Antonio Marquis "L.A." Reid, 1:23-cv-09878-VEC

Dear Judge Caproni:

On behalf of Plaintiff Drew Dixon, I write to seek leave from the "in-person" requirement set forth in the Court's January 8, 2024, Civil Case Management Plan and Scheduling Order (Dkt. 21) at section 5(c), which states that "[w]ithin two weeks of the date of entry of this Scheduling Order, the parties shall meet and confer in person to agree upon a joint plan for meeting the discovery deadlines." Plaintiff's counsel has conferred with Defendant's counsel, who has advised of her availability to meet and confer via Zoom on January 21, 2024. Neither party objects to holding the meet-and-confer via Zoom.

Accordingly, Plaintiff respectfully asks the Court for leave from the "in-person" requirement at Dkt. 21, section 5(c), and for permission for the parties to hold the required meet-and-confer via Zoom.

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

/s/ Kenya K. Davis

Kenya K. Davis

Counsel for Plaintiff Drew Dixon

cc: Counsel of Record (via ECF)

BOIES SCHILLER FLEXNER LLP